

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF OHIO**

<b>IN RE:</b>	)	<b>BANKRUPTCY CASE NO.: 19-14114</b>
	)	
<b>MARY JO WALLER</b>	)	<b>CHAPTER 13 PROCEEDING</b>
	)	
<b>DEBTOR(S)</b>	)	<b>JUDGE JESSICA E PRICE SMITH</b>
	)	
	)	<b><u>DEBTOR'S MOTION FOR AUTHORITY</u></b>
	)	<b><u>TO SELL REAL PROPERTY</u></b>

Now comes the Debtor, Mary Jo Waller, by and through counsel, and hereby moves this Honorable Court for an Order authorizing her to sell real property as follows.

- 1) Debtor filed a Chapter 13 Bankruptcy petition on July 3, 2019. Debtor's Chapter 13 Plan was confirmed on November 25, 2019.
- 2) Debtor's plan of reorganization provides for 100% distribution to unsecured creditors.
- 3) Debtor is the owner of vacant land located at N. Boone Road in Columbia Station, OH situated in Lorain County (see Schedule A). This property is not encumbered by any mortgage or lien.
- 4) Debtor has received an offer and has entered into a purchase agreement to sell the subject property for the amount of \$120,000.00. (See Purchase Agreement, attached hereto as Exhibit A and incorporated herein). The sale of this property will yield enough proceeds to pay off Debtor's Creditors at a 100% distribution. Debtor currently owes the estate approximately \$80,000.00. Accordingly, this offer is fair and reasonable and is of great benefit to her Creditors.
- 5) The proceeds of the sale shall go directly to the Trustee in order to pay off Debtor's claims with the remaining balance going to the Debtor.

6) It is in the best interests of Debtor and her Creditors that said property be sold pursuant to the terms set forth in the Purchase Agreement. The proposed sale will not prejudice or harm the interests of creditors; instead the proposed sale will greatly benefit all parties.

WHEREFORE, Debtor respectfully requests an Order granting her authority to sell her real property located at N. Boone Road in Columbia Station, Ohio and situated in the County of Lorain.

Respectfully submitted,

**J.P. AMOURGIS & ASSOCIATES**

/s/ Y. Eric Holtz  
Y. Eric Holtz (0084326)  
Attorney for Debtors  
3200 West Market Street, Ste. 106  
Akron, Ohio 44333-3324  
Phone: (330) 535-6650  
Fax: (330) 535-2205  
yeholtz@amourgis.com

**CERTIFICATE OF SERVICE**

I certify that on May 9, 2020 a true and correct copy of the foregoing was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Lauren A Helbling served electronically
- United States Trustee served electronically

And by regular U.S. mail, postage prepaid, on:

All Creditors, Per Attached List

/s/ Y. Eric Holtz  
Y. Eric Holtz (0084326)

Label Matrix for local noticing  
0647-1  
Case 19-14114-jps  
Northern District of Ohio  
Cleveland  
Wed Jul 3 11:59:12 EDT 2019

Howard M. Metzenbaum U.S. Courthouse  
United States Bankruptcy Court  
Howard M. Metzenbaum U.S. Courthouse  
201 Superior Avenue  
Cleveland, OH 44114-1235

Capital One  
Attn: Bankruptcy  
Po Box 30285  
Salt Lake City, UT 84130-0285

Chase Card Services  
Attn: Bankruptcy  
Po Box 15298  
Wilmington, DE 19850-5298

Citibank  
Attn: Recovery/Centralized Bankruptcy  
Po Box 790034  
St Louis, MO 63179-0034

Cuyahoga County Court of Common Ple  
1200 Ontario Street  
Cleveland, OH 44113-1610

(p)DISCOVER FINANCIAL SERVICES LLC  
PO BOX 3025  
NEW ALBANY OH 43054-3025

Eric S. Peterson, Esq.  
1100 Superior Avenue  
19th Floor  
Cleveland, OH 44114-2521

Huntington  
Attn: Bankruptcy CAS056  
3 Cascade Plaza  
Akron, OH 44308-1124

Huntington National Bank  
c/o Officer of the Institution or  
Highest Ranking Officer  
5555 Cleveland Ave.  
Columbus, OH 43231-4048

Huntington Natl Bk  
Attn: Officer or Agent  
7 Easton Oval  
Columbus, OH 43219-6060

Kia Motors Finance  
Attn. Officer or Agent  
4000 Macarthur Blvd.  
Newport Beach, CA 92660-2558

Kia Motors Finance  
Attn: Bankruptcy  
Po Box 20825  
Fountain Valley, CA 92728-0825

Kia Motors Finance  
P.O. Box 20835  
Fountain Valley, CA 92728-0835

Meaningful Beauty  
PO Box 2017  
Harlan, IA 51593-0232

(p)PORTFOLIO RECOVERY ASSOCIATES LLC  
PO BOX 41067  
NORFOLK VA 23541-1067

RBS Citizens Cc  
1 Citizens Dr.  
Ms: Rop 15b  
Riverside, RI 02915-3035

Synchrony Bank/Sams Club  
Attn: Bankruptcy Dept  
Po Box 965060  
Orlando, FL 32896-5060

Lauren A. Helbling  
200 Public Square Suite 3860  
Cleveland, OH 44114-2322

Mary Jo A. Waller  
3329 W. 44th St.  
Cleveland, OH 44109-1077

Y. Eric Holtz  
Amourgis & Associates  
3200 W. Market Street Suite 106  
Akron, OH 44333-3324

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Discover Financial  
Attn: Bankruptcy Department  
Po Box 15316  
Wilmington, DE 19850

Portfolio Recovery  
Attn: Bankruptcy  
120 Corporate Blvd  
Norfolk, VA 23502

End of Label Matrix	
Mailable recipients	20
Bypassed recipients	0
Total	20